

CHAPTER 94 EVALUATE FAR PART 135.411(A)(2) OPERATORS, MAINTENANCE RECORD KEEPING SYSTEM

SECTION 1 BACKGROUND

1. PTRS ACTIVITY CODES

A. *Maintenance:* 3358

B. *Avionics:* 5358

3. OBJECTIVE. This chapter provides guidance for evaluating an applicant's procedures for utilizing, preserving, and retrieving the maintenance records from the record keeping system required by FAR Part 135.411(a)(2).

5. GENERAL. To comply with the maintenance recording requirements of the Federal Aviation Regulations, the applicant's maintenance manual must identify and contain procedures to complete all applicable documents used by the applicant.

A. *Current Airworthiness Directive (AD) Status.* The applicant is required to keep a record showing the current status of applicable ADs, including the method of compliance.

(1) This record shall include the following:

- The applicable AD list and the AD revision number
- The date and time in service or cycles, as applicable
- The date and method of compliance
- The time in service or cycles and/or date when the next action is required (if it is a recurring AD)

(2) An acceptable method of compliance should include a reference to one of the following:

- A specific portion of the AD
- A manufacturer's service bulletin, if the bulletin is referenced in the AD
- Another document generated by the applicant that shows compliance with the AD, such as an Engineering Order (EO) or Engineering Authorization (EA).

(3) When an Engineering Order/Engineering Authorization is used, the details must be retained by the applicant. If the Engineering Order/Engineering Authorization also contains the accomplishment instructions and sign-off, it must be retained indefinitely.

(4) An applicant may apply for an alternate method of compliance for accomplishing ADs. Alternate methods of compliance must be approved by the appropriate FAA Certification Directorate and apply only to the applicant making the application.

(5) The applicant's manual must have procedures to ensure compliance with new, emergency ADs within given time limits.

(6) The document that contains the current status of ADs/method of compliance may be the same as the record of AD accomplishment, although the retention requirements are different.

(a) The record of AD accomplishment must be retained until the work is superseded or repeated.

(b) The AD status, including the method of compliance record will only be retained until the work is superseded or repeated.

B. *Total Time in Service Records.* FAR Part 135 requires total time in service records for engines, propellers, and rotors. These records are used to schedule overhauls, retirement life-limits, and inspections and may consist of aircraft maintenance record pages, separate cards or pages, a computer list, or other methods as described in the applicant's manual.

C. *Life-Limited Parts Status Records.* FAR Part 135 requires records for components of the airframe, engine, propellers, rotors, and appliances that are identified to be removed from service when the life-limit has been reached.

(1) The current life-limited status of the part is a record indicating the life-limit remaining before the required retirement time of the component is reached. This record must include any modification of the part in accordance with ADs, service bulletins, or product improvements by the manufacturer or applicant.

(2) The following are not considered a current life-limited status record:

- Work orders
- Maintenance installation records
- Purchase requests
- Sales receipts
- Manufacturers documentation of original certification
- Other historical data

(3) Whenever the current status of life-limited parts records cannot be established or has not been maintained (e.g., a break in current status) and the historical records are not available, the airworthiness of that product cannot be determined and it must be removed from service.

D. *Airworthiness Releases*

(1) When maintenance, preventive maintenance, or alterations on an aircraft are performed, an airworthiness release or log entry must be completed prior to operating the aircraft. Using the procedures described in the manual, the applicant must be able to retain all of the records necessary to show that all requirements for the issuance of an airworthiness release have been met.

(2) The applicant must identify those persons authorized to sign airworthiness releases. This includes any personnel outside of the applicant's organization who perform contract maintenance. Personnel authorized to sign must be appropriately certificated as required by FAR § 135.443.

E. *Overhaul List.* The applicant is required to develop manual procedures for recording the time since the last overhaul of all items installed on the aircraft that are required to be overhauled on a specified time basis. The items requiring overhaul are listed either on the operations specifications or in a document referenced in the operations specifications.

(1) The overhaul list includes the actual time or cycles in service since the last overhaul of all items installed on the aircraft. If continuity cannot be established between overhaul periods, the last overhaul records must be reviewed to reestablish the currency of the overhaul list.

(2) The overhaul list refers to the time since last overhaul of an item and must not be confused with an overhaul record, which requires a description of the work and identification of the person who performed and/or approved the work.

F. *Overhaul Records*

(1) A record must be made whenever an item of aircraft equipment is overhauled and must include the following:

- A description of the work performed or reference to data acceptable to the Administrator

- The name of the person performing the work if the work is performed by a person outside of the applicant's organization
- The name or other positive identification of the individual approving the work

NOTE: A serviceable parts tag does not constitute an overhaul record.

(2) The applicant must retain the record and be able to make it available to the Administrator upon demand. The overhaul records shall be retained until the work is superseded by work of equal scope and detail.

G. Current Aircraft Inspection Status. The applicant is required to retain a record identifying the current inspection status of each aircraft.

(1) This record shall show the time in service since the last inspection required by the inspection program under which the aircraft and its appliances are maintained.

(2) Inspection work packages or routine and non-routine items generated while performing any part of the inspection program must be retained as follows:

- For one year after the work is performed
- Until the work is repeated or superseded by other work

H. Major Alteration and Major Repair. Applicants are required to retain records of current major repairs and major alterations that are accomplished on the following:

- Airframe
- Engine
- Propeller
- Rotor
- Appliance

(1) Major alterations and major repairs must be listed with the date of accomplishment and a brief description of the work performed.

(2) The manual must include procedures for extracting the information required for the list from the actual record of accomplishment of the major alteration or major repair.

Section 2 Procedures

1. PREREQUISITES AND COORDINATION REQUIREMENTS

A. Prerequisites

- Knowledge of regulatory requirements of FAR Part 135
- Working experience with operator record keeping systems
- Successful completion of the Airworthiness Inspectors Indoctrination Course or equivalent

B. Coordination. This task may require coordination between the geographic FSDO and the Certificate Holding District Office (CHDO).

3. REFERENCES, FORMS AND JOB AIDS

A. References

- FAR Part 43
- Applicant's Maintenance Procedures Manual

B. Forms. None.

C. *Job Aids.* None.

5. PROCEDURES

A. *Review the Applicant's Maintenance Manual*

(1) Ensure that the necessary procedures exist in the applicant's manual to ensure a suitable system for creating, preserving and retrieving required records.

(2) Ensure that all records will contain the following information, as applicable:

- Description of the work performed (or reference to data acceptable to the Administrator)
- Name of the person(s) performing the work when the personnel are not employed by the applicant's organization
- Name or other positive identification of the individual approving the work

B. *Review the Applicant's Manual Procedures.* Review the applicant's record keeping procedures to ensure that the following requirements of FAR Part 135 will be met.

(1) *Airworthiness Release Records.* Ensure the following:

(a) The record requirements of FAR § 135.443 will be met

(b) The records will be retained for one year after the work is performed or until repeated/superseded by other work

(2) *Total Time In Service Records*

(a) Evaluate the method of recording total time-in-service of airframes. This record must show the current time in service in hours.

(b) Ensure that procedures are in place to retain the records until the aircraft is sold and that the records will then be transferred with the aircraft.

(3) *Life-Limited Parts Status*

(a) Ensure that the applicant has procedures for tracking the current status of life-limited parts for each airframe, engine, propeller, rotor, and appliance, to include the following information:

- Total operating hours (including calendar time/cycles accumulated)
- Life-limit (total service life)
- Remaining time/cycles
- Modifications

(b) Ensure that procedures are in place to retain the records until the aircraft is sold and that the records will then be transferred with the aircraft.

(4) *Time Since Last Overhaul Records.* Ensure that the manual includes a method/procedure for updating this document from the overhaul records and ensuring that this document accompanies the aircraft upon sale.

(5) *Overhaul Records*

(a) Ensure that the manual describes how the applicant will document the last complete overhaul of each airframe, engine, propeller, rotor and appliance. The overhaul record should include the following information:

- Disassembly data
- Dimensional check data
- Replacement parts list
- Repair data
- Reassembly/test data

- Reference to data including overhaul specifications

(b) Ensure that these records will be retained until the work is superseded by work of equivalent scope and detail.

(6) *Current Aircraft Inspection Status*

(a) Evaluate the method the applicant will use to record the time in service since the last inspection.

(b) Ensure that procedures are in place to retain the records until the aircraft is sold and that the records will then be transferred with the aircraft.

(7) *Airworthiness Directive (AD) Compliance.*

Evaluate how the applicant will comply with the record keeping requirements of the ADs, including emergency ADs. The procedures must generate a record that contains the following data:

(a) *Current status.* Ensure that the current status data will include the following:

- A list of all ADs applicable to the aircraft
- The date and time of compliance
- The time and/or date of the next required action (if a recurring AD)

(b) *Method of compliance.* Ensure that this data will include either a record of the work performed or a reference to the applicable section of the AD.

NOTE: Ensure that the records will be retained until the aircraft is sold and that the records will then be transferred with the aircraft.

(8) *Major Alteration and Major Repair Records*

(a) Evaluate the manual procedures to ensure that the applicant prepares and maintains a list of current major alterations and major repairs to each airframe, engine, propeller, rotor, and appliance.

(b) Ensure that the list includes the following information:

- The date of the work performed
- A brief description of the work performed

(c) Ensure that procedures are in place to retain the list until the aircraft is sold and then be transferred with the aircraft.

C. *Analyze the Findings.* Evaluate all deficiencies to determine if corrective actions will be required.

7. TASK OUTCOMES

A. *File PTRS Transmittal Form*

B. Successful completion of this task will result in the following:

- A letter to the applicant confirming the results of inspection
- Continuation of the certification process

C. *Document the Task.* File all supporting paperwork in the applicant's office file.

9. FUTURE ACTIVITIES. Schedule follow-up inspections as required.

